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| **Consultation Response Form**  **Consultation closing date: 11 October 2013** **Your comments must reach us by that date** |
| Primary assessment and accountability under the new national curriculum |

**If you would prefer to respond online to this consultation please use the following link:** [**www.education.gov.uk/consultation/**](http://www.education.gov.uk/consultation/)

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If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

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| |  |  | | --- | --- | | Textbox | Please tick if you are responding on behalf of your organisation. | | √ |
| |  |  | | --- | --- | | TextBox | Name of Organisation (if applicable): Wandsworth Children’s Services | | |
| |  |  | | --- | --- | | TextBox | Address:  Town Hall, Wandsworth High St, London, Greater London SW18 2PU | | |

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: [consultation.unit@education.gsi.gov.uk](mailto:consultation.unit@education.gsi.gov.uk) or by telephone: 0370 000 2288 or via the department's ['Contact Us'](file:///C:\help\contactus) page.

Please mark the box below that best describes you as a respondent.

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**Teacher assessment and reporting to parents**

1 **Will these principles underpin an effective curriculum and assessment system?**

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| |  |  | | --- | --- | | DfE | Comments:  The Local Authority welcomes the clarity and straightforward nature of the statements that constitute the set of core principles, and which could underpin effective procedures in individual primary schools. Nevertheless, concerns remain. The principles are insufficient to underpin a national assessment system (as the question asks) because the proposals will remove the national and commonly understood set of criteria currently used (levels).  Two great benefits of levels of attainment in relation to a national system of assessment are that they promote both greater consistency and also greater transparency of judgement, especially for new professionals and non-professionals. The loss of levels will mean it will become very difficult for some teachers (especially those that are inexperienced) to understand and evaluate attainment and progress in between the ends of key stages. This is likely to have a significantly negative impact on schools’ ability to monitor the progress of vulnerable groups of pupils in comparison to similar pupils in other schools and other parts of the country.  In addition, although school inspectors are likely to continue to be able to judge the appropriateness of attainment and progress even without a framework of levels, It will be increasingly difficult for their judgements to be understood by non-professionals without the common framework of levels of attainment. The public’s confidence that inspectors are holding schools to account fairly for the achievement of their pupils, may then fall. This is of particular concern at a time when teachers are going to be rewarded for the success of their pupils in external tests and examinations and there is therefore the need for even greater transparency and comparability of results across schools. | |

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2 a) **What other good examples of assessment practice we can share more widely?**

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| Comments:  There are a variety of sources for good examples of assessment practice.   * The knowledge and expertise that remains with many Local Authorities should be tapped into. * The best assessment practices in schools, where the attainment of pupils is most rigorously and effectively assessed and tracked, can often be found where there is a higher proportion of vulnerable pupils. These schools understand well the link between assessment and learning, and use that link effectively, but they are nevertheless sometimes not yet outstanding. Even without this status, their expertise should not be overlooked.   Whichever good examples are used, it will be important to ensure that there is a consistency of rigour and approach to assessment. Without such consistency, once again the ability of external professionals to hold schools to account will be diminished, and, most importantly, some pupils may risk falling behind or be insufficiently challenged because the systems are not effective at identifying their needs. |

2 b) **Is there additional support we can provide for schools?**

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| |  |  | | --- | --- | | DfE | Comments:  Some LAs retain the capacity to support schools with developing effective assessment systems, not least because they have retained statutory functions around end of key stage assessments. This capacity will be invaluable to ensure that schools assess their pupils accurately at all points, and not just at the end of key stages. | |

**National curriculum tests in English, mathematics and science**

3 **Does a scaled score, decile ranking and value-added measure provide useful information from national curriculum tests?**

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| |  |  | | --- | --- | | DfE | Comments:  The best assessment practices, using levels, when combined with effective communication strategies, can already provide parents and teachers with good and clear information about the attainment and progress of pupils. Likewise, there is also some very poor current practice, using the same information as a basis. The implementation of a new decile ranking system in and of itself will not necessarily improve the provision of information. Parents will still need to be supported to interpret the information about their children, especially with regard to progress. For the new system to work, the sharing of best practice regarding how such information might be communicated effectively to parents, and how it could be used to plan for pupils’ next steps, would be critical.  The phrase ‘secondary ready’ has caused much consternation amongst schools consulted with in the LA. For a pupil to be labelled as not ‘secondary ready’, whatever the progress they have made in comparison with their starting point, is potentially extremely demotivating. | |

**Baselines to measure progress**

4 **Should we continue to measure progress from the end of key stage 1, using internally-marked national curriculum tests?**

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| |  |  | | --- | --- | | DfE | Comments:  Measuring progress from the end of KS1 is welcomed, but the exclusive use of test information (as opposed to more rounded teacher assessment judgements) should be approached with caution. Since the introduction of teacher assessment, informed by test and task outcomes, as the vehicle for judging pupil achievement at the end of KS1, the accuracy of reporting this achievement has improved. For example, where a pupil has just slipped into a certain level on the basis of a test, attainment which is not supported by their work on a day to day basis as yet, the reporting of the slightly lower teacher assessment judgement has stood them in better stead when teachers have planned for their next steps in year 3. Similarly, where a pupil has underperformed on the day of the test through illness it has been possible to report the more accurate, higher level.  Also, importantly, the statutory requirement to engage in moderation activities at KS1 has improved teachers’ understanding of progression and planning for pupils’ next steps in a way that the sharing of a test mark does not do. | |

5 **If end of key stage 1 national curriculum test results are used as the baseline to measure progress, should school-level results be published?**

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| |  |  | | --- | --- | | DfE | Comments:  The reporting of a school’s overall KS1 assessment outcomes would be useful:   * To provide a useful comparison for parents when they look at their child’s individual attainment. * To provide another measure for school accountability purposes.   Reporting progress at the end of KS2 in relation to KS1 attainment would also provide a more accurate picture than judging progress between the beginning of Reception year and the end of KS2. Any test carried out in the Reception year is liable to produce flawed results because the pupils are still so young.  Nevertheless, the publishing of these outcomes might result in the rank ordering of schools in performance tables for KS1 as well as KS2 outcomes. Publishing in this way might not be helpful, and cause successful schools to be ranked at an unfairly low level. This could be the case in schools where pupils come in with low levels of English (whether because of deprivation, or because English is not their first language, or both), where pupils make good progress in relation to their starting point which would not be recognised. | |

6 **Should we introduce a baseline check at the start of reception?**

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| |  |  | | --- | --- | | DfE | Comments:  A formal Baseline is about the comparison of all pupils’ or groups of pupils’ progress rather than individuals. For this reason a formal baseline should be undertaken at an age when pupils have had the opportunity to gain sufficient basic language skills to undertake the assessment – that is, at age 7. There should however be some form of national assessment process at some point in the Early Years. This would support a school accountability framework for KS1, identifying progress across this Key Stage, as well as KS2. Breaking up the measurement of progress in this way would also help to ensure that pupil progress is more even across the school, and that school efforts to achieve at least good levels of progress by Year 6 are not overly focused on the end of KS2. This would be especially important if there is no clear, nationally understood, measure of attainment in each year group, which the removal of levels would engender. | |

7 **Should we allow schools to choose from a range of commercially-available assessments?**

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| |  |  | | --- | --- | | DfE | Comments:  Of critical importance to the success of such assessment would be the establishment and implementation of rigorous quality standards to which such commercially-available assessments must adhere. Without such standards, there is the risk that schools could waste significant amounts of money on assessments which provide them with inaccurate information.  Such assessments may focus on testing pupil attainment, to the exclusion of teacher assessment. The development of teacher assessment in all year groups will be important to ensure teachers develop an understanding of pupil progression in relation to the new programmes of study. The standardisation and moderation of teacher assessment would also be important in order to generate a consistency of approach. | |

8 **Should we make the baseline check optional?**

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| |  |  | | --- | --- | | DfE | Comments:  If the implementation of a baseline check results in the EYFS profile data becoming non-statutory, then no, because it will be important for schools to have at least some measure of pupil achievement in the Early Years. | |

**Accountability**

9 **Do you have any comments about these proposals for the Department’s floor standards?**

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| |  |  | | --- | --- | | DfE | Comments:  Whilst the Local Authority very much supports the drive to continue to raise standards in the primary phase that is represented by the move to 85% at the expected level, this figure is very high.  The first point to make about this figure is that, because it will derive from a scaled set of marks, the scaling factor could be changed year on year and therefore it is a less consistent figure than one based on published levels of attainment.  However, given that, Wandsworth Council’s view is that as a high attaining Local Authority, with 85% of pupils attaining Level 4 or above in the combined English and mathematics indicator in 2012, a figure which placed the LA 4th out of 155 LAs in that year, this will be very challenging indeed for a significant proportion of Wandsworth’s high performing schools (93% are currently judged to be good or better). This will particularly be the case if the 85% refers to a pass mark which is the equivalent of a Level 4B currently (the ‘secondary ready’ indicator). It will be important for the progress measures, using KS1 as a baseline, to be retained. | |

10 **If we take a baseline from the start of reception, should end of key stage 1 national curriculum tests become non-statutory for all-through primary schools?**

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| |  |  | | --- | --- | | DfE | Comments:  Measuring progress across each Key Stage is important, not just across the whole school, in order to ensure that pupil progress is more even across the school, and that school efforts to achieve at least good levels of progress by Year 6 are not overly focused on the end of KS2. | |

11 **Should we include an average point score measure in floor standards?**

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| |  |  | | --- | --- | | DfE | Comments:  This would ensure that the achievement of higher attaining pupils is recognised. The reporting of the proportion of pupils attaining a higher standard (equivalent to the current Level 5) might ensure that this is recognised more effectively. | |

12 **Are there any other measures we should prioritise in performance tables?**

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| |  |  | | --- | --- | | DfE | Comments:  Instead of reporting the APS figure of a school, the reporting of the proportion of pupils attaining a higher standard (equivalent to the current Level 5) might ensure that the achievement of higher attaining pupils is recognised. | |

**Recognising the attainment and progress of all pupils**

13 **What data could be published to hold schools (including special schools) accountable for the attainment and progress of the lowest-attaining pupils?**

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| |  |  | | --- | --- | | DfE | Comments:  The LA would support the retaining of P scales, and the reporting of progress for these pupils in relation to the progression guidance. | |

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

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Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](http://www.cabinetoffice.gov.uk/resource-library/consultation-principles-guidance)

The key Consultation Principles are:

* departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
* departments will need to give more thought to how they engage with and consult with those who are affected
* consultation should be ‘digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
* the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: [carole.edge@education.gsi.gov.uk](mailto:carole.edge@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

Completed responses should be sent to the address shown below by 11 October 2013

Send by post to  
Sue White / Jennifer Conlon  
Assessment Team  
Qualifications and Assessment Division  
Department for Education  
Level 2  
Sanctuary Buildings  
Great Smith Street   
London   
SW1P 3BT

Send by e-mail to:[PrimaryAssessment.CONSULTATION@education.gsi.gov.uk](mailto:PrimaryAssessment.CONSULTATION@education.gsi.gov.uk)